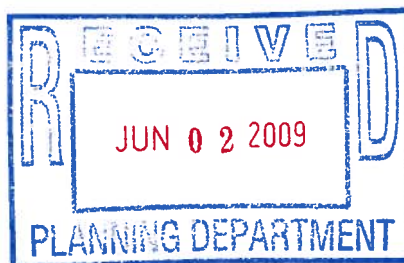


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BY HAND DELIVERY

June 2, 2009

Stephen Gardner
Project Manager
Loudoun County Department of Planning
1 Harrison Street, SE, 3rd Floor
Leesburg, VA 20177



RE: ZMOD 2008-0010, Ashburn Village Shopping Center Comprehensive Sign Plan

Dear Stephen:

This letter includes our response to the staff review comments we have received regarding the initial submission of the sign plan application. Enclosed please find 5 copies of the revised sign plan, which includes a revised Statement of Justification.

The staff review comments are addressed below in chronological order. Each agency's comments are summarized (noted in *Italics*) and followed by our response.

Zoning Administration, Department of Building and Development (comments dated 1/15/09)

1. *Exhibit 1: General Specification for Signs states that shielded lighting will be allowed on temporary signs. Lighting is not permitted on temporary signs; please revise accordingly.*

The "Illumination" paragraph of Exhibit 1 on page 23 has been revised to omit the reference to temporary signs.

2. *Exhibit 5A, Child Care Center, only the freestanding Child Care Center sign may be illuminated; building mounted Child Care Center signs may not be illuminated. Please revise both the Matrix and Exhibit 5A to reflect this.*

We respectfully point out that the prohibition of illuminated building-mounted signs applies only within residential zoning districts. The Ashburn Village Shopping Center is administered as a commercial zoning district, as noted by Zoning staff, within the encompassing Ashburn Village PD-H4 district.

3. *Page 22, Note #3 states that all signs may be illuminated. Real Estate and Temporary signs may not be illuminated. Please revise Note #3 to reflect this.*

Note 3 on page 22 has been revised as requested.

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4. *Exhibit 7B, Community Directional signs on page 64 depicts a McDonalds drive-through sign as an example of a Community Directional sign. Community Directional signs may not contain advertising; the McDonalds sign shown on page 64 is considered a Restaurant sign. Please revise Exhibit 7B accordingly.*

The restaurant drive-through sign example has been removed from former page 64 (now page 65) and has been added as an additional restaurant free-standing sign type, Exhibit 3C, on page 49 and in the sign matrix on page 15.

5. *On Pages 17 and 68, Exhibit 8A – Real Estate – Commercial For-Sale Signs, Section 5-1204(D)(6)(c) is proposed to be modified to allow “1 sign per building face fronting on a public roadway a public roadway or internal drive per office/retail building”. This is excessive, as it could result in over 40 signs being permitted.*

Former pages 17 and 68 (now pages 18 and 69, respectively) have been revised to limit the number of Exhibit 8A Real Estate Signs to no more than 2 for each in-line tenant building and to no more than 1 for each free-standing building.

6. *Section 5-1202(E), Modification to Sign Regulations, states that a request for sign modifications shall include the submission of a Comprehensive Sign package that clearly addresses how the proposed requirements satisfy the public purpose to an equivalent degree. The package as submitted is not comprehensive in that it does not include all of the parcels in the PD-CC-SC district. Staff recommends the plan be revised to include all parcels within the PD-CC-SC district.*

The owner of PIN 085-10-1282 has not responded to a request to be included in this sign plan application. It is noted that this parcel contains an existing restaurant that has its own signage.

7. *Section 5-1202(4) prohibits illuminated signs which reflect or cast glare, directly or indirectly, on any public roadway or adjacent property. The entrance signs (Exhibit 1A and Exhibit 1B) are proposed to be “internally or externally illuminated”. Please provide lighting details to show how these signs as proposed will not reflect or cast glare onto the adjacent roadway/property.*

An example of the external lighting fixture for ground-mounted signs is provided on page 74. The Applicant will work with staff on an appropriate condition of approval regarding the prevention of light trespass.

Community Planning, Department of Planning (comments dated 1/20/09)

Analysis

Signs. *The shopping center is existing and is surrounded by the existing residential community of Ashburn Village. While an update of sign designs and materials may be appropriate, given the nature of this community serving retail center and its visible location in the neighborhood, increasing the number of signs would be excessive. Additionally, several of the proposed signs are much larger than the zoning ordinance permits and are not in scale with the overall*

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development. Therefore, staff does not support an increase in the number of signs or sign size as proposed for the buildings or for the pad sites.

It is noted that the entrance signs, Exhibit 1A, proposed at the Gloucester Parkway and Ashburn Village Boulevard entrances are not as tall as the 15-foot height allowed by the Zoning Ordinance. Furthermore, the proposed area of these double-sided signs, 150 square feet, is consistent with the Zoning Ordinance restriction of 75 square feet per sign face (please see the Zoning Ordinance definition of "Sign, Area of" which states, in pertinent part "In the case of a sign where lettering appears back to back, that is, on opposite sides of a sign, the area of the sign will be considered that of only one side."). Only the proposed background structure of this sign type exceeds the Zoning Ordinance regulations and is justified because of the location of these signs along two four-lane divided roadways. The smaller entrance sign type, Exhibit 1B, proposed for the entrances on Christiana Drive fully complies with the Zoning Ordinance regulations.

Staff has noted that the existing buildings in the Ashburn Village Shopping Center have signage. Most, if not all, of this signage was approved under the 1972 Zoning Ordinance, which generally allowed each tenant to have 3 signs, the largest of which could be 60 square feet, and a total signage area of 100 square feet. Commercial signage under the Revised 1993 Zoning Ordinance has similar restrictions, although different standards apply to specific uses. In consideration to the 1972 signage standards and the extent of the existing signage on the Property, the Application has been revised to maintain a maximum of 100 square feet of sign area for Endcap tenants (Exhibit 2C), exclusive of the Under Canopy signs (Exhibit 2D). The sign plan clearly depicts the allowed location of all signs.

Similarly, the total amount of building mounted signage for restaurants, freestanding buildings, child care centers and gas stations (Exhibits 3A, 4A, 5A and 6A) has been scaled back to 100 square feet with the maximum area of any one sign reduced to 60 square feet, while continuing to allow the back-ground structures of monument signs for these free-standing uses to be up to 200 square feet.

Staff recognizes the applicant's attempt to retain some design flexibility by not providing details except "for illustrative purposes only", but without such commitments and assurances, staff is not able to fully address the entire sign plan in relation to the guidelines found in the Revised General Plan and the Retail Plan for unified graphic design.

Note 6 on page 22 has been revised to delete the "for illustrative purposes only" text. Also, the label "Graphics are interpretive and are subject to change" has been removed from all of the location maps.

Circulation, Parking and Loading. *Staff recommends that the applicant revise the application to reduce the number of signs to only those necessary to provide safe passage of vehicles and pedestrians to and from uses.*

The application has been revised to eliminate the three Exhibit 7A Community Directional Signs proposed on Christiana Drive. Please see the sign location map on page 64.

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Lighting. *Staff recommends that the applicant commit to the proposed language pertaining to lighting included within the submitted sign plan.*


The Applicant will work with staff on an appropriate condition of approval regarding the prevention of light trespass.

We believe this response letter, the revised sign plan and the revised Statement of Justification address the remaining review comments.

Please do not hesitate to contact me if you have any questions or if you require any additional information.

Very truly yours,

Cooley Godward Kronish LLP



Jeffrey A. Nein, AICP
Senior Land Use Planner

cc: Brian Downie, Vice President, Saul Centers, Inc.
Shane M. Murphy, Esq., Cooley Godward Kronish LLP

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